

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, Individually and On Behalf of)
All Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
) 1:03-CV-12628-NG
)
)
)
)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
)
)
x

(Additional captions on following pages)

NOTICE OF MOTION OF THE BHASKAR GROUP FOR APPOINTMENT
AS LEAD PLAINTIFF AND APPROVAL OF PROPOSED LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL.

<hr/> JOHN G. ESPOSITO, On Behalf of Himself and All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS, Defendants.	x))) Civil Docket for Case No.:) 1:04-CV-10013-NG)))))
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MICHAEL E. CRIDEN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE and CARL W. RAUSCH, Defendants.) Hon. Nancy Gertner)) Civil Docket for Case No.:) 1:04-CV-10046-NG)))
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JOSEPH L. KING, On Behalf of Himself and All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS, Defendants.) Civil Docket for Case No.:) 1:04-CV-10038-NG)))
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ISRAEL SHURKIN and SHARON SHURKIN,
Individually and On Behalf of All Others Similarly
Situated,)
Plaintiff,)
v.)
BIOPURE CORPORATION, THOMAS A. MOORE and)
CARL W. RAUSCH,)
Defendants.)
— X —

JAMES J. NIZZO, VIRGINIA C. NIZZO and CARLO
CILBERTI, On Behalf of Themselves and All Others
Similarly Situated,)
Plaintiff,)
v.)
BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
— X —

BARRY BROOKS,)
Plaintiff,)
v.)
BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
— X —

ANASTASIOS PERLEGIS, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS, Defendants.	x)))))))	Civil Docket for Case No.: 1:04-CV-10078-NG
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MARTIN WEBER, On Behalf of Himself and All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS, Defendants.)))	Hon. Nancy Gertner Civil Docket for Case No.: 1:04-CV-10090-NG
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BRUCE HAIMS, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS, Defendants.)	Civil Docket for Case No.: 1:04-CV-10144-NG
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MODEL PARTNERS LIMITED, Individually and On)
Behalf of All Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
) 1:04-CV-10155-NG
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICILARDS,)
Defendants.)
----- X

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JUNE E. PATENAUME, Individually and On Behalf of)
All Others Similarly Situated,)
Plaintiff,) Civil Docket for Case No.:
) 1:04-CV-10179-NG
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICILARDS,)
Defendants.)
----- X

W. KENNETH JOHNSON, On Behalf of Himself and All Others Similarly Situated,	x
Plaintiff,)
) Civil Docket for Case No.:
) 1:04-CV-10190-NG
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
)

NANCY L. PINCKNEY and GERTRUDE PINCKNEY, Individually and On Behalf of All Others Similarly Situated,	x
Plaintiff,)
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE and CARL W. RAUSCH,)
Defendants.)
)

GREGORY KRUSZKA, On Behalf of Himself and All Others Similarly Situated,	x
Plaintiff,)
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,)
Defendants.)
)

PLEASE TAKE NOTICE that the Bhaskar Group ("Movant"), as defined in the accompanying Memorandum of Law, respectfully moves this Honorable Court to issue an order pursuant to Section 27 of the Securities Act of 1933, 15 U.S.C. § 77z-1; Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), and Rule 42 of the Federal Rules of Civil Procedure: (i) consolidating the above-captioned related actions, (ii) appointing Movant as Lead Plaintiff in the consolidated action, and (iii) approving Movant's selection of Goodkind Labaton Rudoff & Sucharow LLP as Lead Counsel for the class.

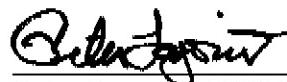
The grounds for this motion are stated in the Memorandum of Law in Support of this Motion and the Declaration of Christopher Keller and accompanying exhibits submitted herewith.

A copy of this Notice has been sent to all parties on the attached proof of service.

Dated: March 1, 2004

Respectfully submitted,

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*Attorneys for the Bhaskar Group
And Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March 2004, I have caused a true and correct copy of the foregoing: Notice of Motion of the Bhaskar Group for Appointment as Lead Plaintiff and Approval of Proposed Lead Plaintiff's Selection of Lead Counsel, Memorandum of Law in Support of the Bhaskar Group for Appointment as Lead Plaintiff and Approval of Proposed Lead Plaintiff's Selection of Lead Counsel, Declaration of Christopher Keller in Support of Motion of the Bhaskar Group for Consolidation of Related Actions, Appointment as Lead Plaintiff and Approval of Proposed Lead Plaintiff's Selection of Lead Counsel, and [Proposed] Order Consolidating the Related Actions, Appointing the Bhaskar Group as Lead Plaintiff and Approving Lead Plaintiff's Selection of Lead Counsel, to be served via first class mail to all counsel on attached service list.



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